

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

NOTICE OF MOTION

v.

JEFFREY RICHARDS

Defendant

19-CR-106

PLEASE TAKE NOTICE that upon the Affirmation of David R. Addelman Esq., dated May 23, 2019, and upon all prior proceedings had herein, the undersigned moves this Court to withdraw as counsel in this matter.

Dated: Buffalo, New York
May 23, 2019

Respectfully Submitted,

s/ David R. Addelman

David R. Addelman P.C.
Attorney for Defendant,
JEFFREY RICHARDS
69 Delaware Avenue, Suite 602
Buffalo, New York 14202
Tel. (716) 856-4118
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TO: Brendan T. Cullinane Esq.
Assistant United States Attorney
138 Delaware Avenue
Buffalo, New York 14202

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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AFFIRMATION

v.

JEFFREY RICHARDS

Defendant

19-CR-106

David R. Addelman, under penalties of perjury, declares and states, as follows:

1. I am an attorney admitted to practice law in the Western District of New York and am assigned through the CJA Program to represent the Defendant, Jeffrey Richards, in this matter.

2. I received a medical diagnosis which resulted in surgery being performed out of state on April 15, 2019. In addition to recovering from the surgery, I am receiving further treatments which are severely limiting my ability to work for the next several months.

3. The Defendant, Jeffrey Richards, desires to move forward with this matter without further delay. An Indictment was filed against the Defendant on May 17, 2019 and he is currently detained pre-trial.

4. I am unable to proceed at this time.

5. I believe it would be in everyone's best interest to allow me to withdraw in this matter and for new counsel to be appointed to represent the Defendant. My client joins in this request.

WHEREFORE, I move to withdraw as counsel for the Defendant, Jeffrey Richards.

Dated: May 23, 2019
Buffalo, New York

s/ David R. Addelman

David R. Addelman, Esq.
Attorney for Defendant,
JEFFREY RICHARDS
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